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SUPREME COURT  
OF NEW JERSEY AS A  
CIVIL TRIAL ATTORNEY

May 31, 2013

\*\* NEW YORK BAR

**Honorable Morris Stern**  
United States Bankruptcy Court  
P.O. Box 1352  
Newark, NJ 07101-1352

Re: **Benjamin J. Ashmore, Debtor**  
Ch. 7; Case No. 13-17450-MS  
Trustee's Notice of Motion  
to Extend Deadline for the Interim  
Trustee and U.S. Trustee to File a  
Complaint Objecting to Discharge  
Return Date: June 17, 2013

Dear Judge Stern:

Please be advised that this office represents Trustee Barbra A. Edwards in the above matter. The original 341(a) hearing set for May 13, 2013 was adjourned because the debtor failed to provide proof of his Social Security Number at the hearing. The 341(a) hearing has now been rescheduled for June 25, 2013.

The debtor initially indicated that he would be unavailable on June 25, 2013, however, in the opposition filed to this Motion, it appears that the debtor will be available for a hearing on that date. The deadline to file a Complaint objecting to discharge or to determine the dischargeability of certain debts is July 12, 2013.

Under the circumstances, it is the position of the Trustee that, should the debtor attend the 341(a) hearing on June 25, 2013, it would be reasonable to extend the deadline to September 23, 2013, and in the event that the debtor fails to appear at the next scheduled hearing date, that the deadline be extended to December 31, 2013 to allow sufficient time for the Trustee to arrange another hearing date with the pro se debtor.

Respectfully submitted,

  
**JAMES P. D'ALESSANDRO,**  
For the Firm

JPD:md

TO: United States Bankruptcy Court  
DATE: May 31, 2013  
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CC: **Mr. Benjamin Jeffrey Ashmore**  
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